

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

|                          |   |                     |
|--------------------------|---|---------------------|
| IN RE:                   | : | CHAPTER 13          |
| Scott Cummings           | : |                     |
| Vicki Cummings           | : |                     |
| Debtor(s)                | : | BKY. NO. 10-13824SR |
| Scott and Vicki Cummings | : | ADV. NO.            |
| 3154 Friendship Street   | : |                     |
| Philadelphia, PA 19149   | : |                     |
| v.                       | : |                     |
| American General Finance | : |                     |
| 6418 Sackett Street      | : |                     |
| Philadelphia, PA 19149   | : |                     |

**COMPLAINT TO DETERMINE SECURED STATUS (2000 FORD EXCURSION)**

1. The defendant is secured in debtor's 2000 Ford Excursion.
2. The secured proof of claim is \$5,491.05.
3. The vehicle has over 100,000 miles and has a value of \$3,000.

WHEREFORE, pursuant to 11 U.S.C. 506, debtor prays that this Honorable Court find the secured claim of American General Finance to be \$3,000.

Date: June 7, 2010

\_\_\_\_s/\_\_\_\_\_  
Michael A. Cataldo, Esquire  
**Cibik & Cataldo, P.C.**  
1500 Walnut Street, Ste. 900  
Philadelphia, PA 19102